## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

In Re:	) IN CHAPTER 7 PROCEEDINGS
	)
CLAYTON S. ROBIEN	) BK 21-30714
	)
Debtors.	)

## MOTION TO COMPEL TURNOVER BY DEBTOR(S)

Comes now Donald M. Samson, trustee, by his attorney, and files this Motion to Compel Turnover by Debtor and in support thereof shows as follows:

- 1. That debtor is under a duty to turnover to the trustee non-exempt property of the estate.
  - 2. That the trustee has requested from the debtor turnover of:
    - a) Non-exempt funds in Midwest Members Credit Union savings account in the amount of \$1,131.41.
    - b) Comic books and toy/action figures
    - c) Copies of 2021 federal and state tax returns
- 3. That debtor has failed to turnover said personal property, non-exempt funds, and tax returns.

WHEREFORE, Donald M. Samson, trustee, prays that debtor(s) be ordered to turnover to Donald M. Samson, trustee, said personal property, non-exempt funds, and tax returns and for such further relief as this court deems just and equitable.

DATE: 05/25/22

/s/ Donald M. Samson DONALD M. SAMSON, Attorney for Trustee 226 W. Main St., Ste., 102 Belleville, IL 62220 618-235-2226

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on the 25th day of May, 2022, a copy of the foregoing document, Motion to Compel Turnover, was served upon the following electronically or by first class mail:

Clayton S. Robien 907 E. Ferguson Ave. Wood River, IL 62095

Michael J. Benson Attorney at Law 801 Lincoln Highway, Ste. B Fairview Heights, IL 62208

U.S. Trustee Becker Bldg., Rm. 1100 401 Main St. Peoria, IL 61602

/s/ Donald M. Samson